



# Oregon

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ENVIRONMENTAL CLEANUP

February 28, 2014

Mr. Robert J. Wyatt  
NW Natural  
220 N.W. Second Avenue  
Portland, OR 97209

**Re: NW Natural Response to DEQ Comments  
Remedial Investigation Data Summary Report and Field Sampling Plans  
Historical Manufactured Gas Plant Activities  
Siltronic Corporation Property  
Portland, Oregon  
ECSI Nos. 84 and 183**

Dear Mr. Wyatt:

The Oregon Department of Environmental Quality (DEQ) reviewed NW Natural's responses to our November 27, 2013 comments on the following documents:

- "Remedial Investigation Data Summary Report, Historical Manufactured Gas Plant Activities - Siltronic Corporation Property, 7200 NW Front Avenue Portland, Oregon" dated March 31, 2011 (RI Data Summary Report);
- "Supplemental Remedial Investigation Field Sampling Activities, Doane Creek Embankment Soil and Sediment - Siltronic Corporation Property, 7200 NW Front Avenue, Portland, Oregon" dated March 29, 2012 (Doane Creek FSP);
- "Supplemental Remedial Investigation Field Sampling Activities, DNAPL Characterization - Siltronic Corporation Property, 7200 NW Front Avenue, Portland, Oregon" dated April 12, 2012 (DNAPL FSP);
- "Supplemental Remedial Investigation Field Sampling Activities, Groundwater Monitoring Well Installation - Siltronic Corporation Property, 7200 NW Front Avenue, Portland, Oregon" dated July 23, 2012 (Groundwater Monitoring FSP).

DEQ received the responses to our comments on December 19, 2013 (DNAPL FSP, Groundwater Monitoring FSP) and January 29, 2014 (Doane Creek FSP, RI Data Summary Report).

In addition, DEQ reviewed the "Revised Supplemental Remedial Investigation Field Sampling Activities, Doane Creek Embankment Soil and Sediment - Siltronic Corporation Property, 7200 NW Front Avenue, Portland, Oregon" dated January 29, 2014 (Revised Doane Creek FSP). The Revised Doane Creek FSP was prepared based on DEQ's November 27, 2013 comments to the Doane Creek FSP and a meeting on December 17, 2013.

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Hahn and Associates, Inc. (Hahn) prepared the responses to DEQ's comments and the Revised Doane Creek FSP on behalf of NW Natural.

DEQ's comments to the each set of NW Natural's responses are provided below and are organized according to the relevant document. Note that DEQ comments on the Revised Doane Creek FSP cover both the FSP and NW Natural's responses. This letter focuses on the NW Natural responses that DEQ believes require comment. In other words, if DEQ does not comment on a particular response, it should be understood that DEQ accepts NW Natural's response.

The primary purpose of this letter is to inform NW Natural that DEQ:

- Approves implementing the Groundwater Monitoring FSP consistent with NW Natural's response;
- Approves implementing the DNAPL FSP as indicated in NW Natural's response and with incorporation of DEQ's comments provided below; and
- Approves the Revised Doane Creek FSP subject to NW Natural incorporating DEQ's condition for analyzing embankment and sediment samples and our comment on surface water and groundwater measurements.

DEQ's comments regarding NW Natural's responses to our preliminary comments on the RI Data Summary Report are also included in this letter. Our comments are provided for NW Natural's information and use during preparation of the Draft RI Report. The Draft RI Report will be prepared after the data collection needs of the remedial investigation (RI) of manufactured gas plant (MGP) residuals and contamination on the Siltronic facility are met.

DEQ requests that NW Natural confirm on or before March 14, 2014 that the DNAPL FSP and Revised Doane Creek FSP will be implemented consistent with this letter.

## **DNAPL FSP RESPONSE**

**Section 2.0, Paragraphs 2 and 3, and Figure 2.** Based on NW Natural's conclusion that geophysical methods are not useful at the site and in the interest of meeting the data collection needs of the RI, DEQ requests that contingency borings be added to the DNAPL FSP. DEQ further requests that the borings be drilled if residual dense non-aqueous phase liquid (DNAPL), and/or DNAPL is observed at borings P-51 through P-62. Depending on the location(s) of observations, DEQ recommends contingency borings be positioned between P-13 and P-14; P-20 and P-61; and P-28 and P-61. DEQ also requests that NW Natural provide drilling observations (i.e., material descriptions and photographs) following completion of each boring so the numbers and locations of borings can be adjusted while drilling equipment is on-site.

NW Natural indicates that a step-out boring located south-southwest of Boring P-34 is not feasible due the presence of the Fab 2 Building and a large soil pre-load site. DEQ understands an access road separates the soil pre-load site from the building. DEQ requests that the step-out boring be located along this access road approximately halfway between borings P-24 and P-34.

## **REVISED DOANE CREEK FSP**

**Section 2.0, Data Collection Needs, Paragraph 4; Section 3.0, Sample Collection and Testing, Paragraphs 5-6.** The referenced responses discuss the availability of and need for surface water measurements. NW Natural's related responses to DEQ's comments on the RI Data Summary Report are referenced.

Based on our review of the responses DEQ understands that if the stream gauges in Doane Creek segments DC-1, DC-3, and DC-5 are functional, NW Natural will measure surface water levels (see Section 3.0, Sample Collection and Testing, Paragraphs 5-6 response). For clarification, DEQ confirms our request for groundwater levels near stream gauges to be measured concurrently.

**Section 3.0, Sample Collection and Testing, Paragraphs 1-4 and 5-6; Section 3.2, Analytical Testing, including Tables 3-1 through 3-3; Table 11, Summary of Analytical Results.** The Revised Doane Creek FSP compares the results of analyzing composite embankment and sediment samples to revised tables of human health (tables A-1 and A-2) and ecological screening levels (tables B-1 and B-2). DEQ understands the purpose of the data screening step is to identify analytes for further sampling and analysis per the revised FSP. However, DEQ notes that like the Doane Creek FSP the Revised Doane Creek FSP uses composite sample data for screening purposes and decision making. Although not specifically discussed during the December 17, 2013 meeting, DEQ's November 27, 2013 comments letter requested that decisions regarding the FSP scope of work be based on comparing composite sample results to one-fifth the screening levels.

Upon further consideration of NW Natural's sampling approach, DEQ does not accept or approve the screening step for purposes of developing an analyte list for the embankment and sediment sampling. DEQ will approve the Revised Doane Creek FSP subject to the condition that NW Natural analyze embankment and sediment samples, including those associated with the North Drainage Pond, for the complete list of analytes DEQ approved in the Final MGP RI Work Plan<sup>1</sup>. This condition does not affect the sampling and analytical approach for PAHs specified in the Revised Doane Creek FSP that includes analysis of samples for 34 alkylated PAHs with a homolog scan.

For clarification, based on our condition for approval DEQ did not complete our reviews of tables A-1, A-2, B-1, and/or B-2. Consequently, DEQ does not accept or approve the tables for use. That said, DEQ is currently reviewing the draft Gasco Site uplands human health and ecological risk assessment (HERA) report. DEQ anticipates the HERA approach for the Gasco Site will be applicable to evaluations of MGP contamination on the Siltronic facility.

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<sup>1</sup> Hahn and Associates, Inc., 2007 "Final Remedial Investigation Workplan, Historical Manufactured Gas Plant Activities - Siltronic Corporation Property, 7200 NW Front Avenue Portland, Oregon," October 19, a work plan prepared for NW Natural.

## RI DATA SUMMARY REPORT

**General Comment (Groundwater and Surface Water Elevation Data).** DEQ appreciates the information NW Natural's provides in this response, and acknowledges that more surface water elevation data are available than originally envisioned by the Final MGP RI Work Plan.

**General Comment (Geophysical Pilot Study); Appendix D, Page 6.** Although DEQ has questions and comments regarding the information provided in NW Natural's response, our understanding is that NW Natural concludes geophysical methods are not useful for assessing the configuration of the contact between the fill and upper silt unit. Based on this information DEQ further understands NW Natural will be relying on observations made during drilling to meet this RI objective. Given NW Natural's reliance on drilling observations, DEQ is requesting that contingency borings be added to the DNAPL FSP scope of work.

**Specific Comment: Section 7.2, Site Soil, Pages 98-101.** DEQ understands from the response that hand-auger borings HA-1, HA-2, and HA-3 met with refusal and sampling could not be completed per the Final MGP RI Work Plan. DEQ also understands NW Natural does not consider the sampling to be feasible. DEQ believes the status of and need for sampling and analytical data at the Fab 2 Outfall warrants further discussion.

**Section 7.4.2, Surficial Fill WBZ, Page 136, Table 7.4.1 and Table 27; Appendix H, Figures H1 through H15.** Regarding chemicals of interest (COI), DEQ agrees that discussions regarding the list of COI and data presentation are needed prior to preparation of the Draft RI Report. As indicated in our comment to the Revised Doane Creek FSP, DEQ is currently reviewing the draft Gasco Site HERA report. DEQ anticipates the HERA approach for the Gasco Site will be applicable to evaluations of MGP contamination on the Siltronic facility.

Please don't hesitate to contact me if you have questions regarding this letter.

Sincerely,



Dana Bayuk  
Project Manager  
Northwest Region Cleanup Section

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Patty Dost, Pearl Legal Group  
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Bob Wyatt  
NW Natural  
February 28, 2014  
Page 5 of 5

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ECSI No. 84 File  
ECSI No. 183 File